

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO,  
EASTERN DIVISION**

<b>WALTER DERRICO,</b>	)	<b>CASE NO.: 1:17CV866</b>
	)	
Plaintiff,	)	<b>JUDGE: PATRICIA A. GAUGHAN</b>
	)	
v.	)	
	)	
<b>TORRIS MOORE, <i>et al.</i>,</b>	)	
	)	
Defendants.	)	

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**DEFENDANT, THE CITY OF EAST CLEVELAND'S INITIAL DISCLOSURES**

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NOW Comes, Defendant, the City of East Cleveland, by and through its undersigned attorney of record, and pursuant to Rule 26(a)(1), Federal Rules of Civil Procedure, Defendant hereby makes the following initial disclosures subject to addition and/or revision based on information received through discovery in this lawsuit.

I. Persons who may have discoverable information:

Commander Scott Gardner  
East Cleveland Police Department  
14340 Euclid Avenue  
East Cleveland, Ohio 44112  
216-681-2169

II. Documents, by category that Plaintiff may use at trial

- a. Police records relating to the criminal investigation of Plaintiff's conduct;
- b. Prison records relating to plaintiff's incarceration;
- c. Plaintiff's employment records;
- d. Prison records relating to Plaintiff's incarceration;
- e. Non-privileged records relating to the prosecution of Plaintiff; and

f. Non-privileged records relating to the vacating of Plaintiff's conviction.

III. Documents, by category that Defendant may use at trial.

The documents that Defendant intends to use at trial have not yet been identified.

IV. Insurance.

N.A.

Respectfully submitted,

/s/ Heather McCollough

Heather McCollough (75882)

Director of Law

City of East Cleveland

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Counsel for City of East Cleveland

### **CERTIFICATE OF SERVICE**

A true and accurate copy of *Defendant, The City of East Cleveland's Initial Disclosures* was electronically filed with the Court on this 10<sup>th</sup> day of September, 2018; and that by operation of this Court's electronic notification system a copy thereof is made available to all registered parties.

/s/ Heather McCollough

Attorney for City Defendants